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February 22, 2024

VIA ECF

The Honorable Jessica S. Allen, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Jason Jorjani v. New Jersey Institute of Technology, et al.
Civil Action Nos. 2:18-cv-11693 (WJM-JSA)

Dear Judge Allen:

This office represents the New Jersey Institute of Technology (“NJIT”) and the five individual defendants in this matter. We write to Your Honor regarding the necessary attendees for the settlement conference scheduled for February 27, 2024.

Holly Stern in her capacity as Vice President and General Counsel of NJIT, will attend in person and has full and final settlement authority on behalf of NJIT and all individual defendants, including herself. All of the individual defendants are being defended and indemnified by NJIT and as such, do not have authority or control over settlement of this matter, including former President Bloom and former Provost Deek who no longer are in the NJIT administration in any capacity. Accordingly, we respectfully request that the individual defendants be excused from

The Honorable Jessica S. Allen, U.S.M.J.
February 22, 2024
Page 2

attendance at the conference and that General Counsel Stern be permitted to attend on behalf of all Defendants.

Additionally, the individual with authority on this matter for NJIT's insurer, Ms. Vicki Higman, Associate General Counsel at United Educators, is located out-of-state and suffers from a medical condition that limits her mobility. She will be continually available by phone or video but given her medical limitations we request an accommodation to permit her to attend remotely.

If this approach meets with Your Honor's approval we would request that Your Honor "so order" this letter. Or, if Your Honor prefers, we will submit a proposed form of order.

As always, we are available at the Court's convenience.

Respectfully submitted,

/s/ Marc D. Haefner

Marc D. Haefner

cc: All Counsel of Record (via ECF)